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*Attorneys for Defendants*  
*C. R. Bard, Inc. and*  
*Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability  
 Litigation,

No. 2:15-MD-02641-DGC

**DEFENDANTS' NOTICE OF  
 LODGING UNDER SEAL  
 CERTAIN EXHIBITS IN  
 SUPPORT OF BARD'S TRIAL  
 BRIEF ON THIRD PARTY  
 FAULT**

This Document Relates to:

Debra Tinlin, et al. v. C. R. Bard, Inc., et al.  
 CV-16-00263-PHX-DGC

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively "Bard"), pursuant to the Stipulated Protective Order (Doc. 269), Federal Rule of Civil Procedure 26(c)(1)(G), and Local Civil Rule 5.6 file this notice of lodging under seal certain exhibits attached in support of Bard's Trial Brief on Third Party Fault. These exhibits contain certain Plaintiffs' personal healthcare information that is protected under HIPAA and confidential under the Stipulated Protective Order. Defendants have notified

1 Plaintiffs of their intent to file this Notice of Lodging. Because the documents lodged  
2 under seal only relate to Plaintiffs' personal healthcare information, Defendants note that  
3 it is Plaintiffs' burden to file a motion to seal. A list of the Exhibits sought to be sealed are  
4 attached hereto as Exhibit A.

5 RESPECTFULLY SUBMITTED this 12th day of April, 2019.

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23 **Bard Peripheral Vascular, Inc.**

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**EXHIBIT A**

**DOCUMENTS PROPOSED TO BE FILED UNDER SEAL**

Defendants request they be permitted to file under seal the following documents:

Exhibit A: Excerpts from January 30, 2019 Deposition of Dr. McMeeking

Exhibit C: Expert Report of Dr. Sobieszczyk